

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 04-_____
	:	
v.	:	DATE FILED: _____
	:	
DONOVAN HUGH TREVOR CROOKS,	:	
a/k/a "Randy Jackson"	:	VIOLATION:
	:	8 U.S.C. §§ 1326(a) and (b)(2)
	:	(reentry after deportation by
	:	aggravated felon - 1 count)
	:	Notice of prior conviction
	:	Notice of additional factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 13, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

DONOVAN HUGH TREVOR CROOKS,

an alien and a subject of Jamaica, who had previously been deported from the United States on or about July 20, 1994, was found in the United States, having knowingly and unlawfully re-entered the United States without first applying to the United States Attorney General or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Sections 1326(a) and (b)(2).

NOTICE OF PRIOR CONVICTION

THE GRAND JURY FURTHER CHARGES THAT:

Defendant **DONOVAN HUGH TREVOR CROOKS** committed the offense charged in Count One of this Indictment after having been convicted of at least one aggravated felony, as that term is defined and used in 8 U.S.C. §§ 1101(a)(43)(B) and 1326(b)(2), as follows:

On or about November 15, 1991, defendant DONOVAN HUGH TREVOR CROOKS was convicted in the Circuit Court for Baltimore City, Maryland of the offense of possession of heroin, in violation of Article 27, Section 287 of the Maryland Criminal Code, after he had previously been convicted on March 15, 1989, in the Circuit Court for Baltimore City, Maryland of possession of cocaine, in violation of Article 27, Section 287 of the Maryland Criminal Code.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment, defendant DONOVAN HUGH TREVOR CROOKS committed the instant offense after he had been deported after (a) a conviction for a felony drug trafficking offense for which the sentence imposed was 13 months or less; (b) a conviction for an aggravated felony; and (c) a conviction for any other felony, as those terms are defined by U.S.S.G. § 2L1.2(b)(1).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney